



December 7, 2004

Karen Baker, Branch Chief  
Dept. of Toxic Substances Control  
Permitting, Geology & Corrective Action Branch  
5796 Corporate Avenue  
Cypress, CA 90630

Florence Gharibian, Branch Chief  
Dept. of Toxic Substances Control  
Statewide Compliance Division  
1011 N. Grandview Avenue  
Glendale, CA 91201

RE: Phibro-Tech, Inc. (formerly Southern California Chemical)  
Docket No. HWCA 87/88-004  
November 2004 Monthly Summary Report

Dear Mss. Baker and Gharibian:

This monthly summary report with attached tables constitutes a submittal by Phibro-Tech, Inc., formerly Southern California Chemical (SCC), to the Department of Health Services (DHS) in compliance with the terms of the Consent Agreement signed by DHS on August 27, 1987. Table IV was added to the monthly summary report listing the number of loads of hazardous waste received as required by the Hazardous Waste Facility Permit issued to SCC on 6/29/91.

The summary addresses Section 3.3 and 3.4 of the Consent Agreement. The report describes: A) The actions taken during the previous month (Table I); B) Actions expected to be undertaken during the current month (Table II); C) All results of sample analyses, tests and other data generated or received; and D) Expenditures to date in compliance with the Consent Agreement (Table III). Table IV lists the number of loads of hazardous waste received during the current month.

If you have any questions, please contact me at (562) 698-8036.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Voss", followed by a long, horizontal, slightly wavy line that extends to the right.

Martin Voss  
EHS Manager

cc: See following page

cc: Waste Programs Branch  
U.S. Environmental Protection Agency  
75 Hawthorne Avenue  
San Francisco, CA 94105

Steve Cohen  
Phibro -Tech, Inc.  
One Parker Plaza  
Fort Lee, NJ 07024

### **Table I**

The following is a summary of actions taken during the month of November 2004 by Respondent in compliance with the Consent Order.

1. The Fourth Quarter Groundwater Monitoring Report commenced being prepared.
2. Changes to the latest revision of the Site Conceptual Model were submitted to DTSC on September 15, 2004. DTSC appears to be pleased with the latest changes and it appears that the document will be approved. \*

3. Phibro-Tech submitted the following work plans and reports to DTSC in 1998 and 2001:

- a. "Phase II Soil Vapor Survey and SVE Pilot Test Work Plan", dated October 17, 2001
- b. "Bioventing Treatability Study Work Plan", dated February 16, 1998.
- c. "Final Soil Vapor Survey Work Plan", dated February 16, 1998
- d. "Final Phase I corrective Action Soil Vapor Survey Report", dated November 16, 2001

Phibro-Tech received comments regarding these work plans and reports in a letter from DTSC dated March 12, 2004. \*

4. Phibro-Tech, with the help of CDM, submitted a Generic Soil Vapor Survey work plan to DTSC on June 23, 2004. \*
5. A conference call was held on October 26, 2004 with the DTSC. During this call, Phibro-Tech and CDM discussed a tentative plan to begin soil vapor survey work during the first two weeks of December 2004.

\*Note: These items did not take place in November but as noted. They are being kept here to retain the latest developments for site corrective action.

**Table II**

Respondent will take the following actions during the month of December 2004 in compliance with the Consent Order:

1. The Fourth Quarter 2004 Groundwater Monitoring Report will continue being prepared.
2. The Soil Vapor Survey work will most likely begin during the first half of December 2004.

TABLE III

AFE #	DESCRIPTION	PARAGRAPH NO.	APPROVED \$ AMOUNT	CURRENT MONTH EXPENDITURE	YEAR TO-DATE EXPENDITURE	EXPECTED COMPLETION DATE	CONTRACTOR/ PERSONNEL USED
101802	NH3 ETCH STORAGE TANK A-12	3.1.10	14500	0	14539	COMPLETED	XERXES CO./SCC
102806	HCL STORAGE TANK REPLACEMENT	3.1.10	30500	0	33501	COMPLETED	EXRXES CO./SCC
102807	HCL2 STORAGE REPLACEMENT TANK	3.1.10	25080	0	17037	COMPLETED	XERXES CO./SCC
102907	J-2 REPLACEMENT	3.1.10	13000	0	14243	COMPLETED	EXRXES CO./SCC
103808	PB/SN TREATMENT TANK	3.1.10	20800	0	19204	COMPLETED	XERXES CO./SCC
103911	DRUM PAN FOR ERS AREA		5000	0	5057	COMPLETED	EXRXES CO./SCC
103912	FIX PART OF COPPER SULFATE AREA		7400	0	7050	COMPLETED	MOODY/SCC
103915	INCREASE CONTAINMENT WALL HEIGHT-CUO AREA		5000	0	4875	COMPLETED	MOODY CONST.
104812	PAINT AND REPAIR CATWALKS IN COPPER OXIDE AREA	3.1.10	10000	0	15319	COMPLETED	DIVERSITY PAINTING CO.
104813	PAINT WASTE TREATMENT SUPERSTRUCTURES	3.1.10	6000	0	6195	COMPLETED	DIVERSITY PAINTING CO.
9-00	COPPER OXIDE RENOVATION	3.1.10	22000	0	24192	COMPLETED	MOODY/SCC
105816	SURVEILLANCE CAMERA		6122	0	6520	COMPLETED	SO. CALIF. SAFE CO.
105817	HIGH-LEVEL ALARMS & CONTROLS FOR TANKS		155934	0	118446	COMPLETED	MILTRONICS/DIGITAL
106819	PLATFORM & GRATING FOR CUSO4 MIX TANKS		10500	0	6137	COMPLETED	XERXES CO./SCC
107716	COPPER CEMENT DRAIN PAN	3.1.10	2350	0	0	COMPLETED	SCC
107821	ADDITIONAL EXTERNAL PERIMETER CORRECTION		31000	0	22973	COMPLETED	ATLANTIC FENCE CO.
107822	HAZARDOUS WASTE DRUMS STORAGE AREA		15000	0	10890	COMPLETED	
108719	AMMONIA AUTOMATIC SHUT OFF SYSTEM	3.1.10	875	0	3201	COMPLETED	SCC
108720	DESIGN, APPROVE AND GET ESTIMATE TO REBUILD FERRIC AREA TO MEET DHS STANDARDS	3.1.10	15000	0	12936	COMPLETED	R.L. WOOD & ASSOCIATES
108721	REPAIR AND REPLACE PERIMETER FENCE		8000	0	30573	COMPLETED	ATLANTIC FENCE CO.
108722	PAINT WAREHOUSE/MAINTENANCE & TRAILERS LIGHT BLUE		8000	0	12570	COMPLETED	DIVERSITY PAINTING CO.
108723	REPAIR LEAKS. PAINT TANKS, CATWALKS IN COPPER SULFATE AREA	3.1.10	10000	0	13695	COMPLETED	SCC/DIVERSITY PAINTING CO.
108724	ADD ON NEW CONTAINMENT IN COPPER SULFATE AREA TO REPLACE BAD EXISTING CONTAINMENT	3.1.10	15000	0	15912	COMPLETED	ELESIO CEMENT
108725	BUY AND INSTALL AMMONIA DEMISTER ON COPPER OXIDE SCRUBBER	3.1.10	3000	0	2546	COMPLETED	SCC
108726	REPAIR ALL ELECTRICAL CONDUITS AND STANCHIONS IN COPPER OXIDE AREA TO REDUCE POTENTIAL POLLUTION PROBLEMS		10000	0	6040	COMPLETED	SCC
108727	REPAIR LEAKING PIPES, VALVES AND PUMPS IN THE COPPER OXIDE AREA	3.1.10	10000	0	20416	COMPLETED	SCC
108728	PURCHASE FIBERGLASS CHOPPER GUN TO RELINE CONTAINMENT AREA	3.1.10	3000	0	5447	COMPLETED	THALCO CO.
108729	PURCHASE REBUILT FRONT END LOADER FOR DIRT MOUND CLEANUP	3.1.15	15000	0	15968	COMPLETED	COOK TRACTOR

TABLE III

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108730	PURCHASE AND INSTALL 2 AMMONIA SENSOR, RECORDERS	3.1.10	5000	0	3150	COMPLETED	INTERNATIONAL SENSOR CO./SCC
108731	BUILT AND INSTALL AMMONIA SCRUBBER IN ETCH AREA	3.1.10	20000	0	31623	COMPLETED	XERXES CO./SCC
108732	PAINT TANKS AND CATWALKS IN AMMONIA ETCH AREA	3.1.10	10000	0	8554	COMPLETED	DIVERSITY PAINTING CO.
108733	REMOVE LEAKING TANKS IN LEACH AREA	3.1.11	5000	0	3827	COMPLETED	CONSTRUCTION
108735	CUT UP AND HAUL OFF ALL JUNK EQUIPMENT	3.1.11	10000	0	10388	COMPLETED	J. LEVIN CO./SCC
108738	CLEAN-UP OF SOIL MOUND	3.1.15	50000	0	128159	COMPLETED	SENTINEL WASTE MGMT.
108739	CLEAN-UP OF TANK #3	3.1.15	50000	0	30753	COMPLETED	SCC
108827	DRIP PANS		17740	0	16667	COMPLETED	SCC
108829	FIX PIPING AND STANCHIONS IN COPPER RECYCLING AREA		20000	0	26632	COMPLETED	SCC
108830	DRUM WASH & INSTALLATION OF AMMONIA SCRUBBER		28000	0	27805	COMPLETED	FIBERGRATE/HARRINGTON
109744	A1B MIX TANK REPLACEMENT FOR TIGHTER AMMONIA EMISSION CONTROL	3.1.10	14000	0	20004	COMPLETED	XERXES CO./SCC
109832	COPPER OXIDE COOLING REQUIREMENTS		28110	0	34394	COMPLETED	SCC
109834	CUPRIC REPLACEMENT	3.1.10	28000	0	29056	COMPLETED	XERXES CO./SCC
109835	C-4 REPLACEMENT	3.1.10	14000	0	12882	COMPLETED	XERXES CO./SCC
109837	SECURITY GATE & GUARD HOUSE		13000	0	21215	COMPLETED	HONEYWELL, ATLANTIC FENCE
110751	ADDITIONAL SPENT A STORAGE	3.1.19	31500	0	20333	COMPLETED	XERXES CO./SCC
12-00	S-2 STORAGE TANK REPLACEMENT	3.1.10	15000	0	13535	COMPLETED	MOODY/XERXES CO.
13-00	C1A REACTOR BOILOUT REPLACEMENT	3.1.10	20000	0	20639	COMPLETED	MOODY/XERXES CO.
14-00	S1B CUSO4 TANK REPLACEMENT	3.1.10	23000	0	21157	COMPLETED	MOODY/XERXES CO.
111841	ERS - AREA A STORAGE TANK	3.1.10	10800	0	11882	COMPLETED	XERXES CO./SCC
111842	C-9 REPLACEMENT TANK	3.1.10	15800	0	15728	COMPLETED	EXRXES CO./SCC
111843	FLOOR COATING - ERS DRUM STORAGE AREA		12392	0	11753	COMPLETED	HOWARD RIDLEY CO.
112758	FIBERGLASS-LINE COPPER OXIDE CONTAINMENT AREAS	3.1.10	25000	0	11248	CLOSED	SCC
8-00	REBUILD FERRIC CHLORIDE AREA	3.1.10	450000	0	330865	CLOSED	
15-00	COMPLETE PERIMETER FENCE		15000	0	13295	COMPLETED	ATLANTIC FENCE
285-00	FERRIC CHLORIDE AREA RECON DESIGN	3.1.10	6200	0	8537	COMPLETED	J. PLESNIK
345-00	FERRIC CHLORIDE AREA RECON/REHAB	3.1.10	190000	0	158000	COMPLETED	MOODY CONSTRUCTION
	ADMINISTRATIVE, LEGAL AND TECHNICAL		0	7558	3256532		
	DISPOSAL EXPENSE		0	0	37695		
			1605603	7558	4801790		

**TABLE IV**

Month/Year	Hazardous Waste Loads	Year to Date
Jan/04	96	96
Feb/04	112	208
Mar/04	135	343
Apr/04	117	460
May/04	99	559
Jun/04	98	657
Jul/04	96	753
Aug/04	110	863
Sep/04	102	965
Oct/04	107	1072
Nov/04	91	1163
Dec/04		